



City of Seattle

Gregory J. Nickels, Mayor

Department of Planning & Development

Diane M. Sugimura, Director

October 2, 2009

Washington State Building Code Council
Peter D. DeVries, Chair
P.O. Box 42525
Olympia, WA 98504-2525

Re: 2007 Proposed Amendments

Dear Mr. DeVries and Councilmembers:

On behalf of the City of Seattle Department of Planning and Development, I would like to present comments on the 2009 State Building Codes.

International Building Code. Seattle submitted two code change proposals related to accessible means of egress that were recommended by the IBC TAG, and that we encourage the Council to approve. The proposals will amend Sections 1007.1 and 1010.1. These proposals address problems encountered with requirements for accessible means of egress in parking garages. In parking garages where parking is provided on the ramps, the accessible parking spaces are usually located on flat areas at the ends of the ramps. One accessible means of egress can usually be easily provided on the flat portion of the garage ramp. However, many times, the second required means of egress is provided at the other end or at the center of the garage, and is accessed via the vehicle ramp. While the ramp may be able to provide the correct slope to provide the second accessible means of egress from the accessible parking spaces (1 vertical in 12 horizontal), it is impractical in these types of garages to provide features such as handrails on both sides of the ramp, or to provide a landing for every 30 inches of rise. Therefore, we are proposing that Sections 1007.1 and 1010.1 be modified to allow the second accessible means of egress to be relieved from complying with specific provisions for maximum rise, landings, and handrails. The proposed amendment is modeled on the provisions in Section 1010.1, exception 3, which allows the deletion of those provisions for vehicle ramps used as exit access for pedestrians.

VIAQ. We support the efforts to integrate the requirements of the Ventilation and Indoor Air Quality into the model codes. Compliance and enforcement will be much easier and it will be easier to keep the ventilation provisions updated and coordinated with the other codes.

There is a discrepancy between the IBC and IMC ventilation provisions. Proposed IBC Section 1203.4 requires Group R Occupancies in buildings four stories and less to comply with the residential ventilation provisions. Proposed IMC Section 401.2.1 requires all Group R occupancies to comply with the residential ventilation sections. In addition, IMC Section 403.8.6.1, item 2 applies to high-rise buildings. We believe that there is good reason to require mechanical ventilation in all residences, and that was the TAG's intent.

International Residential Code. Seattle Department of Planning and Development supports the proposal to allow local jurisdictions to choose whether or not to require sprinklers in residential buildings. Local conditions vary widely, including political conditions, which makes state approval of local decisions problematic and inconsistent.

An additional list of detailed comments is attached. In addition, Mayor Nickels and John Hogan are submitting comments on the proposed Energy Code. We appreciate the opportunity to express our views.

Sincerely,

(signed)

Jonathan C. Siu, P.E., S.E.
Principal Engineer/Building Official

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State Residential Code Comments

- R102.7.2 The last paragraph should be formatted as part of exception 2
- R202 The definition of “unusually tight construction” should be deleted because it isn’t used in the IRC, the existing amendments, or the proposed amendments.
- R302.2.4 In this section on structural independence of townhouse separations, IRC exception 3 includes both wall and roof coverings, while the proposed state amendment includes only walls. Roof coverings should be allowed to span dwelling unit separations to provide complete weather protection.
- R302.3 An amendment is proposed for R302.3, but IRC has a section with that number that should remain, and the amendment should be renumbered. The cross reference to Section R317.3 appears to be incorrect—R317.3 deals with protection of wood from decay, not protection of exterior walls. The reference probably should be Section R302.4.
- R311.4 An IRC section with that number exists and should remain; either that section or the proposed amendment should be renumbered.
- R322.2.1 #2 The last sentence should be “design flood elevation” not “design load elevation”
- R702.5, 5th line Should be “gypsum board backer” instead of “packer”
- R703.1.1 The title is missing, as is sentence referencing Section R601.3.
- R1006.2 The last sentence should be formatted as part of exception 2.
- M1302.2 A mechanical chapter is wrong place to require plans and specifications to disclose “structural panel materials”. The requirement should either be deleted or the proposed section should be added to Chapter 1. The requirement is taken from the VIAQ, and is intended to allow jurisdictions to check for compliance with Section R702.5.
- M1501 This section should be kept for exhaust systems other than ventilation.
- M1507 A better title would be “Source Specific Ventilation”
- M1508.4.5 The reference to “where allowed by IBC” should be deleted. The IBC doesn’t apply to buildings built according to the IRC, and the IRC doesn’t limit undercutting of doors.
- Appendix R This appendix should be numbered beginning with R101.

State Building Code Comments

308.3	Changes to the 2009 IBC should be included.
310.1	This section should either include uses Section 308.3 allows as R, or those uses should be deleted from Section 308.3.
403.5.4	The word “level” should be deleted. (This is an error that will be corrected in future printings of the IBC.)
420.4	Cross references should be corrected.
708.14.1	Exception 5 is missing some words that are found in the 2009 IBC and are needed to make the exception complete.
1106.3	The TAG recommended deleting the amendment to this section. While many patients may drive themselves to appointments at hospital outpatient facilities and would need accessible parking spaces, few residents of I-1 occupancy facilities, who “because of age, mental disability or other reasons, live in a supervised residential environment that provides personal care services” are unlikely to drive their own vehicles.
1203.4	This section is inconsistent with the IMC, which applies the same ventilation provisions to all Group R occupancies.
1403.2	This section has incorrect citations, and the 2009 IBC exception 3 for EIFS is missing.
2104.	This section has incorrect citations.
2903	This section begins with 2903.3 instead of 2903.1.
Table 2902	Footnotes have incorrect cross references.
3404.1	This section has incorrect citations.
3411.8.11	We recommend using the term “family or assisted use” instead of “unisex” for consistency with the 2009 IBC, and because the new term better describes the type of facility.
IEBC 101.4	This section should state that the IEBC applies to additions.

State Mechanical Code Comments

202 Bathroom exhaust should be included in definition of “environmental air”.

Table 403.3:

Day care through age 4 is missing from Education category.

Under “private dwellings”, footnote b should be referenced at “garages” and “kitchens”; footnote g is referenced at “kitchens” but footnote g is being deleted.

Values are missing in third column for added items under “Public spaces”.

Under “specialty shops” IMC uses 7.5 in second column; “pet shops” should have “(animal areas)^b” in first column.

“sports and amusement” has a comma missing after “stadium”.

Under “workrooms” third column in “copy, printing rooms” line should be 4 instead of 45.

In “for SI”, 1 square foot = 0.0929...

References should be deleted where the footnotes are being deleted.

403.8.2	Item 5.3 should be deleted—it’s not about controls and it’s covered by Section 403.8.5.1.
403.8.4.2	The specific HVI standard should be cited, not put in parentheses since it’s intended to be mandatory.
403.8.4.2	The exception should read “Range hoods and down-draft exhaust fans used for source specific exhaust for kitchens are not required to be rated.”
403.8.4.2	Item 2 should be deleted because it’s covered by Section 304.1.
403.8.5	This section needs clearer charging language such as “All whole house ventilation systems shall comply with Sections 403.8.5.1 and 403.8.5.2”.
403.8.5.2	For clarity, Items 2 & 3 should refer to “ventilation integrated with forced air systems” instead of “dedicated or central supply systems”--that’s the term used in the charging paragraph to describe that form of ventilation system.
403.8.6.1	The 2009 IBC’s definition of “high rise building” should be added either here or in Chapter 2.
403.8.6.3	Should item 4 be R-4 instead of R-4.5?
404.5	This section should be numbered 404.4.
507.2.1	“R-2 type occupancy”.